



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ICR/JEA/PAS  
F. #2020R00508

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 5, 2021

By ECF, Email and USAfx

Amanda David, Esq., and Samuel Jacobson, Esq.  
Federal Defenders of New York, Inc.  
One Pierrepont Street, 16th Floor  
Brooklyn, New York 11201

Re: United States v. Samantha Shader  
Criminal Docket No. 20-202 (DLI)

Dear Defense Counsel:

Enclosed please find the government's fifth discovery production in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This supplements the disclosure of Rule 16 discovery produced to the defendant on July 15, 2020, July 24, 2020, August 27, 2020 and October 28, 2020. The government also reiterates its prior request for reciprocal discovery from the defendant.

I. The Government's Discovery

A. Document's and Tangible Objects

Samantha Shader Advice of Rights Forms	SHADER_000922-SHADER_000923
Threat Intake Correspondence	SHADER_000924
Jeffrey Butler Correspondence	SHADER_000925-SHADER_000927
FBI 302s	SHADER_000928-SHADER_000994
Notes and Photos Associated with FBI 302s	SHADER_000995-SHADER_001097
CART 1A94 Attachments	SHADER_001098-SHADER_001100
Other Activity FBI 302s	SHADER_001101-SHADER_001119
ESU Report ES7ESD2194944	SHADER_001120-SHADER_001122

B. Defendant's Criminal History

Crime Scene Photos pertaining to SHADER_00756_00772	SHADER_001123-SHADER_001161
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C. Search Warrant Applications, Affidavits and Photos

A copy of a warrant application, warrant and an affidavit in support of a warrant to search Darian Shader's iPhone, signed June 4, 2020	SHADER_001162-SHADER_001191
A copy of a warrant application, warrant and an affidavit in support of a warrant for Timothy Amerman's DNA, signed on July 1, 2020	SHADER_001192-SHADER_001206
A copy of a warrant application, warrant and an affidavit in support of a warrant to search Darian Shader's black Fiat 500 Gucci, signed on June 4, 2020	SHADER_001207-SHADER_001237
A copy of a warrant application, warrant and an affidavit in support of a warrant to search the premises located at 15 Underwood Street, Saugerties, New York 12477, signed on July 1, 2020	SHADER_001238-SHADER_001286
Photos obtained pursuant to a premises search warrant at 15 Underwood Street, Saugerties, New York 12477	SHADER_001287-SHADER_001475
A copy of a warrant application, warrant and an affidavit in support of a warrant to search the off-white 2005 citation fifth wheel series M-31-5PBS travel trailer located at 42°03'51.5" 74°03'48.3"W in Saugerties, New York, signed on June 1, 2020	SHADER_001476-SHADER_001519

D. Subpoena Returns, Third Party Documents and Facebook Posts

Subpoenas and Third Party Documents	SHADER_001520-SHADER_001766
Facebook Posts	SHADER_001767-SHADER_001816

E. Videos

Surveillance Video of 115 Eastern Parkway	SHADER_001817
Surveillance Video of 198 Flatbush Avenue	SHADER_001818
Surveillance Video of 271 Flatbush Avenue	SHADER_001819
Surveillance Video of 293 Flatbush Avenue	SHADER_001820

F. NYPD Records

NYPD Arson and Explosion Case	SHADER_001821-SHADER_001837
NYPD Crime Scene Unit Case	SHADER_001838-SHADER_001949
NYPD Latent Print Case	SHADER_001950-SHADER_001958
NYPD Real Time Crime Case	SHADER_001959-SHADER_001978

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned attorneys.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/  
Ian C. Richardson  
Jonathan E. Algor  
Phil Selden  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)